

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**ALYSSON MILLS, IN HER CAPACITY AS
RECEIVER FOR ARTHUR LAMAR
ADAMS AND MADISON TIMBER
PROPERTIES, LLC,**

Plaintiff,

vs.

**CIVIL ACTION NO.
3:19-cv-00196-CWR-FKB**

**BANKPLUS; BANKPLUS WEALTH
MANAGEMENT, LLC; GEE GEE
PATRIDGE, VICE PRESIDENT AND
CHIEF OPERATING OFFICER OF
BANKPLUS; STEWART PATRIDGE;
JASON COWGILL; MARTIN
MURPHREE; MUTUAL OF OMAHA
INSURANCE COMPANY; AND MUTUAL
OF OMAHA INVESTOR SERVICES, INC.,**

Defendants.

GEE GEE PATRIDGE'S MOTION TO DISMISS

Gee Gee Patridge, by and through undersigned counsel, files this Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6) in response to the Complaint filed against her by Plaintiff Alysson Mills, in her capacity as Receiver for Arthur Lamar Adams and Madison Timber Properties, LLC. For the reasons set forth in Gee Gee Patridge's Memorandum of Law in support of this Motion to Dismiss, she respectfully requests the Court dismiss with prejudice Counts I, II, and III, of the Complaint for civil conspiracy, aiding and abetting, and negligence, gross negligence, and recklessness.

Respectfully submitted this, the 21st day of May, 2019.

GEE GEE PATRIDGE

/s/ Robert P. Thompson
ROBERT P. THOMPSON

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically filed with the Clerk of Court using the ECF system which sent notifications of service to all counsel of record.

This the 21st day of May, 2019.

/s/ Robert P. Thompson
ROBERT P. THOMPSON